



**Lewis  
Baach  
Kaufmann  
Middlemiss**  
PLLC

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/19/2019

202 659 7203  
eric.lewis@lbkmlaw.com

March 18, 2019

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Application GRANTED. This request is untimely. Nevertheless, the deadline for Applicants to amend their Petition is extended nunc pro tunc from March 18, 2019, to March 28, 2019.

Dated: March 19, 2019

New York, New York

**LORNA G. SCHOFIELD**

**UNITED STATES DISTRICT JUDGE**

**Re: Case No. 1:19-mc-00042-LGS, *In re Application of Lilly Perry, et al. for Judicial Assistance Pursuant to 28 U.S.C. § 1782:*  
Motion for Enlargement of Time**

Dear Judge Schofield:

We represent Applicants Lilly Perry, *et al.* (the “Applicants”) in the above matter. The Applicants respectfully move for a brief enlargement of time, until March 28, 2019, to seek to amend their *ex parte* Petition in this matter. The original and current due date for seeking to amend the Petition is today, March 18, 2019. There have been no prior requests to extend this due date. In support of their motion, the Applicants state as follows:

1. On January 31, 2019, the Applicants filed an *ex parte* Petition and supporting papers to request judicial assistance pursuant to 28 U.S.C. § 1782 to permit discovery in this district for use in a pending criminal proceeding in the Principality of Liechtenstein.
2. On March 7, 2019, the Court denied the Petition without prejudice, allowing Applicants to seek to amend the Petition by filing updated papers by March 18, 2019. (Doc. No. 5.)
3. Since the Petition was filed, there have been ongoing developments in the Liechtenstein proceeding. These developments have prompted the Applicants to evaluate whether it will be necessary to continue to pursue their Petition at this juncture and if so, how the relief sought can be circumscribed.
4. Applicants’ counsel for the criminal proceeding have been actively engaged with Liechtenstein authorities and are assessing the position. They require additional time to provide an updated declaration to address the current position as may be necessary if the Applicants decide to proceed. A brief enlargement of the time in which to seek to amend the Petition would allow the Applicants to complete their evaluation so as to make a fully-informed decision whether to continue to seek this Court’s assistance with respect to the foreign proceeding at this time and if so how best to do so. The requested

The Honorable Lorna G. Schofield  
March 18, 2019  
Page 2

enlargement would serve the interests of judicial efficiency, and would cause no undue delay in the Court's ultimate disposition of the Petition.

Therefore, the Applicants respectfully request that this Court grant an enlargement of time, up to and including March 28, 2019, for them to seek to amend the Petition in this matter.

We thank the Court for its consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric L. Lewis". The signature is fluid and cursive, with the first name "Eric" and last name "Lewis" clearly distinguishable.

Eric L. Lewis